

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of

Revision of the Commission's Rules	)	CC Docket 94-102
to Ensure Compatibility with Enhanced	)	
911 Emergency Calling Systems	)	

**COMMENTS IN SUPPORT OF DECLARATORY RULING**

Orange County Florida E911 Public Safety Communications Division hereby submits the following support letter to the supplement to the "Request for Declaratory Ruling" that The Association of Public Safety Communications Officials, (APCO) filed on October 6, 2004 (hereinafter "Request"), in the above-referenced proceeding. The Request seeks clarification regarding the geographic area over which a wireless carrier must provide the levels of 9-1-1 location accuracy specified in the Commission's rules and the degree to which carriers must provide accuracy data to relevant Public Safety Answering Points ("PSAPs").

Orange County Florida E911 supports nine primary and two secondary 9-1-1 centers by doing our own testing for wireless 9-1-1 calls made to their PSAPS. Orange County E911 is comprised of public safety professionals, who have identified the need for wireless testing and are concerned with the footprint to be tested that is recommended and supported by the Carriers. We currently are testing at the PSAP level and find the data collected very useful to mitigate problems we find. As 911 Managers, we know how important it is to provide accurate location information to the call takers and support, at a minimum, Metropolitan Statistical Areas (MSAs) and Rural Statistical Areas (RSAs) testing.

State-wide compliance testing (as suggested by NRIC VII) is not acceptable. We also suggest that testing be required every two years, as we do here, to ensure no degradation of the networks.

APCO explained in its Request that existing Commission rules and policies are unclear on several key issues related to wireless carriers' obligations to provide location information to PSAPs. APCO noted that the Emergency Service Interconnection Forum (ESIF) and the Network Reliability and Interoperability Council VII (NRIC VII) had attempted to address some of these issues, but were unable to reach consensus.

Despite substantial efforts by all parties, the deliberations did not lead to a consensus among all major public safety and industry participants. Orange County supports APCO and does not concur with the NRIC VII report, as critical issues were left unresolved, deferred, or addressed with vague language. Whereas APCO urged the Commission to provide the necessary guidance to ensure meaningful implementation and enforcement of the wireless E9-1-1 rules, Orange County would like to be on record as supporting their request.

Respectfully Submitted,

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